

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	:	<b>BANKRUPTCY CASE NO. 17-11351-TPA</b>
	:	
<b>Milton Wallace,</b>	:	<b>CHAPTER 13</b>
<b>Debtor,</b>	:	
	:	<b>DOCKET NO.: 50</b>
<b>PNC Bank, N.A.,</b>	:	
<b>Movant,</b>	:	
	:	
<b>vs</b>	:	
	:	
<b>Milton Wallace,</b>	:	
	:	
<b>And</b>	:	
	:	
<b>Ronda J. Winnecour, Esquire,</b>	:	
<b>Chapter 13 Trustee</b>	:	
<b>Respondents.</b>	:	

**DEBTOR’S OBJECTION TO MORTGAGE PAYMENT CHANGE OF PNC BANK, N.A, AT CLAIM NUMBER 10**

**AND NOW** comes the Debtor, Milton Wallace, by and through his attorney, DANIEL P. FOSTER, of FOSTER LAW OFFICES, and files the within DEBTOR’S OBJECTION TO MORTGAGE PAYMENT CHANGE OF PNC BANK, N.A. and in support thereof, aver as follows:

1. On February 13, 2018, the Debtor filed a Voluntary Petition in Bankruptcy under Chapter 13 of the Bankruptcy Code.
2. PNC Bank, N.A. filed a Notice of Mortgage Payment Change in this instant case on November 26, 2021.
3. PNC Bank, N.A. is now seeking a new monthly payment of \$1,487.64 which consists of principal and interest. The difference (**\$717.94**) appears to be an excessive.
4. Debtor objects to this Notice of Mortgage Payment Change as the escrow shortage/recoupment is unreasonable four years into the bankruptcy case. The new payment requirement is unreasonable given the debtors budget.

**WHEREFORE**, the Debtor respectfully prays that this Honorable Court DENY the Mortgage Payment Change filed by PNC Bank, N.A.

Date: December 14, 2021

Respectfully Submitted,

/s/ Daniel P. Foster, Esquire

Daniel P. Foster, Esquire

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